

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth.

ORDER GRANTING FIVE HUNDRED TWENTY-FIRST OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO PARTIALLY  
SATISFIED AND PARTIALLY NO LIABILITY CLAIMS

Upon the *Five Hundred Twenty-First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Partially Satisfied and Partially No Liability Claims* (the “Five Hundred Twenty-First Omnibus Objection”)<sup>2</sup> of the Commonwealth of Puerto Rico (the “Commonwealth”), dated September 16, 2022, for entry of an order modifying certain claims filed

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Twenty-First Omnibus Objection.

against the Debtors, as more fully set forth in the Five Hundred Twenty-First Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Twenty-First Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Twenty-First Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to Be Reduced and Allowed” in Exhibit A to the Five Hundred Twenty-First Omnibus Objection (collectively, the “Claims to Be Reduced”) having been partially satisfied and/or not giving rise to any liability of the Commonwealth; and the Court having determined that the relief sought in the Five Hundred Twenty-First Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Twenty-First Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Twenty-First Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Reduced are hereby modified as set forth in Exhibit A to the Five Hundred Twenty-First Omnibus Objection; and it is further

ORDERED that Kroll is authorized and directed to modify the amounts of the Claims to Be Reduced set forth on the official claims register in the Title III Cases; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Five Hundred Twenty-First Omnibus Objection**

ASSERTEDMODIFIED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	23922	Commonwealth of Puerto Rico	Unsecured	\$2,773.75	Commonwealth of Puerto Rico	Unsecured	\$85.05
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices totaling \$1,105.00 in the agency's system. Additionally, invoices totaling \$1,583.70 were paid via EFTs 3648, 4304, and 4364 on 01/26/2018, 05/03/2018, and 05/10/2018. The Claimant shall retain the non-modified portion of the claim.								
2	CRESPO & RODRIGUEZ INC. PO BOX 270029 SAN JUAN, PR 00928	21515	Commonwealth of Puerto Rico	Unsecured	\$14,297.56	Commonwealth of Puerto Rico	Unsecured	\$8,341.85
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices totaling \$1,233.50 in the agency's system. Invoices totaling \$4,255.46 fail to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Health Insurance Administration (ASES), Medical Services Administration, Municipality of San Lorenzo, and Puerto Rico Ports Authority, which are not part of the Title III proceedings. The Claimant shall retain the non-modified portion of the claim. Claim #21515 also contained on Exhibit A to the 372nd Omnibus Claims Objection for Modified Claims.								
3	ESTUDIOS TÉCNICOS, INC. PO BOX 12144 SAN JUAN, PR 00914-0144	27512	Commonwealth of Puerto Rico	Unsecured	\$98,650.00	Commonwealth of Puerto Rico	Unsecured	\$68,412.50
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices totaling \$24,237.50 in the agency's system. The Claimant shall retain the non-modified portion of the claim. Claim #27512 also contained on Exhibit A to the 391st Omnibus Claims Objection for Modified Claims.								
4	PR STORAGE FORKLIFT DIVISION PO BOX 250060 AGUADILLA, PR 00604	45353	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Commonwealth of Puerto Rico	Unsecured	\$116.55
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice totaling \$3,200.00 in the agency's system. Additionally, invoices totaling \$5,797.38 were paid via checks/ EFTs 00000958, 00002185, 00002975, 00003481, 00003979, and 00004691 on 10/24/2016, 05/10/2017, 09/18/2017, 12/29/2017, 03/09/2018, and 06/28/2018. Also, the claim was fully unliquidated, modified amount fully liquidates the claim.								